

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

Deutsche Bank Akteingesellschaft, et. al.,

Defendants.

Case No. 1:22-CV-10018 (JSR)

**PLAINTIFF JANE DOE 1'S NOTICE OF MOTION AND  
MOTION FOR CLASS CERTIFICATION**

PLEASE TAKE NOTICE that, pursuant to this Honorable Court's March 28, 2023, scheduling order (ECF No. 62), Lead Plaintiff Jane Doe 1 ("Lead Plaintiff" or "Jane Doe 1"), by and through her undersigned attorneys, hereby respectfully moves this Court for an Order: (1) certifying this action pursuant to Rule 23 as a class action; (2) appointing Jane Doe 1 as the Class Representative; (3) appointing Boies Schiller Flexner LLP, Edwards Pottinger LLC, and Paul Cassell as Class Counsel; and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is based upon the accompanying memorandum of law, accompanying declarations and exhibits, the pleadings and records on file in this case, and such other matters and arguments as the Court may consider.

Dated: April 28, 2023

Respectfully Submitted,

/s/ David Boies

David Boies

Andrew Villacastin  
Sabina Mariella  
Boies Schiller Flexner LLP  
55 Hudson Yards  
New York, New York  
Telephone: (212) 446-2300  
Fax: (212) 446-2350  
Email: dboies@bsfllp.com  
Email: avillacastin@bsfllp.com  
Email: smariella@bsfllp.com

Sigrid McCawley (*pro hac vice*)  
Daniel Crispino (*pro hac vice*)  
Boies Schiller Flexner LLP  
401 E. Las Olas Blvd. Suite 1200  
Fort Lauderdale, FL 33316  
Telephone: (954) 356-0011  
Fax: (954) 356-0022  
Email: smccawley@bsfllp.com  
Email: dcrispino@bsfllp.com

Bradley J. Edwards  
Edwards Pottinger LLC  
425 N. Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301  
Telephone: (954) 524-2820  
Fax: (954)-524-2822  
Email: brad@epllc.com

Brittany N. Henderson  
Edwards Pottinger LLC  
1501 Broadway  
Floor 12  
New York, NY  
Telephone: (954) 524-2820  
Fax: (954) 524-2820  
Email: brittany@epllc.com

Paul G. Cassell (*pro hac vice*)  
S.J. Quinney College of Law at the  
University of Utah  
383 S. University St.  
Salt Lake City, UT 84112  
Telephone: 801-585-5202  
Fax: 801-585-6833  
Email: cassellp@law.utah.edu

(institutional address for identification purposes, not to imply institutional endorsement)

*Counsel for Jane Doe 1*